

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

MAREMONT CORPORATION, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-10118 (KJC)

Jointly Administered

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON MARCH 26, 2019 AT 3:00 P.M. (ET)  
BEFORE THE HONORABLE KEVIN J. CAREY<sup>2</sup>**

**MATTER GOING FORWARD**

1. Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 12, 2019) (Docket No. 136)

Related Documents:

- (a) Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed January 22, 2019) (Docket No. 10)
- (b) Disclosure Statement for the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed January 22, 2019) (Docket No. 11)
- (c) Declaration of Jung W. Song of Donlin, Recano & Company, Inc. Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed January 22, 2019) (Docket No. 12)

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal taxpayer identification number, are: Maremont Corporation (6138); Maremont Exhaust Products, Inc. (9284); AVM, Inc. (9285); and Former Ride Control Operating Company, Inc. (f/k/a ArvinMeritor, Inc., a Delaware corporation) (9286). The mailing address for each Debtor for purposes of these chapter 11 cases is 2135 West Maple Road, Troy, MI 48084.

<sup>2</sup> The hearing will be held before The Honorable Kevin J. Carey at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801. Any person who wishes to appear telephonically at the hearing must contact COURTCALL, LLC at 866-582-6878 to register his/her telephonic appearance in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised May 11, 2018.

- (d) Order (I) Scheduling Combined Hearing to Consider Approval of Disclosure Statement and Confirmation of Prepackaged Plan, (II) Establishing the Plan and Disclosure Statement Objection Deadline and Related Procedures, (III) Approving the Solicitation Procedures and Forms of Ballots, (IV) Approving the Form and Manner of Notice of the Combined Hearing, Objection Deadline, and Notice of Commencement, (V) Conditionally Directing that a Meeting of Creditors Not Be Convened, (VI) Conditionally Extending Deadline to File Schedules and Statements, and (VII) Granting Related Relief (Entered January 23, 2019) (Docket No. 30)
- (e) Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan (Filed January 24, 2019) (Docket No. 33)
- (f) *MEALEY's Asbestos Bankruptcy Report* Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing To Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan (Filed January 30, 2019) (Docket No. 39)
- (g) *USA Today* Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan (Filed January 30, 2019) (Docket No. 40)
- (h) *MEALEY's Litigation Report* Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan (Filed January 30, 2019) (Docket No. 41)
- (i) *The Wall Street Journal* Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan (Filed January 30, 2019) (Docket No. 42)

- (j) *The New York Times* Affidavit of Publication of the Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Cases, (II) Combined Hearing to Consider Approval of Disclosure Statement, Confirmation of Prepackaged Plan of Reorganization, and Related Matters, (III) Objection Deadline and Related Procedures, and (IV) Summary of the Plan (Filed January 30, 2019) (Docket No. 43)
- (k) Plan Supplement to the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates (Filed February 15, 2019) (Docket No. 65)
- (l) Notice of Filing of Plan Supplement to the Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates (Filed February 15, 2019) (Docket No. 66)
- (m) Notice of Filing of Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 12, 2019) (Docket No. 137)
- (n) Notice of Filing of Blackline of Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates and Revised Certain Exhibits (Filed March 12, 2019) (Docket No. 138)
- (o) Declaration of Carl D. Anderson, II in Support of the Adequacy of the Disclosure Statement and Confirmation of the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 12, 2019) (Docket No. 139)
- (p) Declaration of James L. Patton, Jr. in Support of the Adequacy of the Disclosure Statement and Confirmation of the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 12, 2019) (Docket No. 140)
- (q) Notice of Filing of Proposed Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (I) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 12, 2019) (Docket No. 142)

- (r) Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 13, 2019) (Docket No. 143)
- (s) Debtors' Ex Parte Motion For Leave to Exceed Page Limit Requirements With Respect to Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 13, 2019) (Docket No. 144)
- (t) Compendium of Unreported Authorities Cited in Debtors' Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 13, 2019) (Docket No. 145)
- (u) Order Granting Ex Parte Motion For Leave to Exceed Page Limit Requirements With Respect to Memorandum of Law in Support of Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Entered March 13, 2019) (Docket No. 149)
- (v) Notice of Filing of Black Line of Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates and Exhibit (Filed March 17, 2019) (Docket No. 155)
- (w) Notice of Filing of Revised Proposed Findings of Fact, Conclusions of Law and Order (I) Approving the Adequacy of the Disclosure Statement, (I) Approving the Prepetition Solicitation Procedures, and (III) Confirming the Modified Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 17, 2019) (Docket No. 158)

Objection Deadline: March 4, 2019 at 4:00 p.m.

On consent of the parties, the Objection Deadline was extended to 4:00 p.m. on March 12, 2019 for the Ohio EPA/AG, the Department of Justice, and FFIC.

Responses Received:

- (a) Objection of the Acting United States Trustee to the Disclosure Statement and Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (D.I. 10, 11) (Filed March 4, 2019) (Docket No. 112)
- (b) Response of the Official Committee of Asbestos Claimants to the Objection of the Acting United States Trustee to the Disclosure Statement and Joint Prepackaged Plan of Reorganization of Maremont Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Filed March 12, 2019) (Docket No. 141)

Status: The continued hearing on confirmation of the proposed Plan will be going forward. The Debtors are in discussions with the U.S. Trustee regarding additional language to be added to the Asbestos Personal Injury Trust Distribution Procedures.

Dated: March 22, 2019

SIDLEY AUSTIN LLP  
James F. Conlan  
Andrew F. O'Neill  
Allison Ross Stromberg  
Blair M. Warner  
One South Dearborn Street  
Chicago, Illinois 60603  
Telephone: (312) 853-7000  
Facsimile: (312) 853-7036

-and-

COLE SCHOTZ P.C.

/s/ J. Kate Stickle

Norman L. Pernick (No. 2290)  
J. Kate Stickle (No. 2917)  
500 Delaware Avenue, Suite 1410  
Wilmington, Delaware 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117

ATTORNEYS FOR THE DEBTORS AND  
DEBTORS IN POSSESSION